

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No. 05-30111-MAP

JAMES V. CARIDDI,)
Plaintiff)
)
v.)
)
CONSOLIDATED ALUMINUM CORPORATION,)
Defendant)
)

JOINT STATEMENT REQUESTING ISSUANCE OF SCHEDULING ORDER

Pursuant to the Court's Status Conference on November 26, 2007, and in accordance with Fed. R. Civ. P. 16(b) and Local Rule 16.1, counsel for the Plaintiff, James V. Cariddi and counsel for Defendant, Consolidated Aluminum Corporation have conferred and submit the following:

The July 28, 2005 Scheduling Order addressed the first phase of the litigation and limited discovery to issues relating to oil/petroleum and hazardous substances under CERCLA and/or M.G.L. c. 21E and "causation" under M.G.L. c. 21E, §5(a)(5). The parties now propose the following schedule to complete discovery to prepare this matter for trial:

1. Update of automatic disclosures by December 21, 2007;
2. Motions to amend pleadings shall be filed by December 31, 2007;
3. All written discovery shall be served by January 21, 2008;
4. Non-expert depositions shall be completed by March 10, 2008;
5. Plaintiff shall designate his expert witnesses by March 24, 2008, and shall disclose information regarding his experts as required by Fed. R. Civ. P. 26(a)(2) by April 7, 2008;

6. Defendant shall designate and disclose information regarding its trial experts as required by Fed. R. Civ. P. 26(a)(2) by April 21, 2008;
7. All expert depositions shall be completed by May 26, 2008; and
8. Final Pre-Trial Conference to be scheduled in June 2008.

Respectfully submitted,

CONSOLIDATED ALUMINUM CORPORATION
By its attorneys,

JAMES V. CARIDDI
By his attorneys,

/s/ Robert D. Cox, Jr.

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Dated: December 3, 2007

CERTIFICATE OF SERVICE

I, Robert D. Cox, Jr., hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on December 3, 2007.

/s/ Robert D. Cox, Jr.